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April 19, 2018

**Via U.S. Mail and email to: [quality@epa.gov](mailto:quality@epa.gov)**

Information Quality Guidelines Processing Staff  
Mail Code 2821T  
USEPA  
1200 Pennsylvania Ave NW  
Washington, D.C. 20460

***Re: Request for Extension of Time for Filing  
Request of Reconsideration of Request for Correction  
# 17002 (chloroprene)  
Our File: 165671-00***

Dear Sir or Madam:

On January 25, 2018, the U.S. Environmental Protection Agency (EPA) denied (hereinafter referred to as “the Denial”) the Request for Correction (RFC) #17002 submitted on behalf of Denka Performance Elastomer LLC (DPE) concerning the 2010 Toxicological Review of Chloroprene (CAS No. 126-99-8) (hereinafter, “the 2010 Review”). Pursuant to the EPA Information Quality Act (IQA) guidelines and the Denial itself, EPA recommends that DPE submit any appeal in the form of a Request for Reconsideration (RFR) within 90 days of the January 25 Denial. That is, by April 25, 2018.

The purpose of this letter is to request a 90-day extension of the time allowed for DPE to file its RFR. The IQA Guideline 8.6 provides:

EPA recommends that requesters submit their RFR within 90 days of the EPA decision. If the RFR is sent after that time, EPA recommends that the requester include an explanation of why the request should be considered at this time.

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JONES WALKER LLP

ALABAMA \* ARIZONA \* DISTRICT OF COLUMBIA \* FLORIDA \* GEORGIA \* LOUISIANA \* MISSISSIPPI \* NEW YORK \* TEXAS

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DPE's RFC and the 47 page Denial involved detailed reviews of the development of the 2010 Review and the analysis of complex issues of science. DPE's RFR similarly involves a rigorous review of the record of this matter, the development process of the 2010 Review, and the underlying scientific issues. In addition, DPE has filed two Freedom of Information Act (FOIA) requests with the EPA on March 6, 2018 (EPA-HQ-2018-005179 and EPA-HQ-2018-005180), both of which concern information related to the Denial and the 2010 Review process. The agency has requested additional time to respond to these FOIA requests and has not yet responded. We have also engaged experts to assist DPE in preparing its RFR. Due to the time required to collect all relevant information and documents, and the scientific complexity of this matter, DPE requests an additional 90 days from April 25, or until July 24, 2018, to submit its RFR.

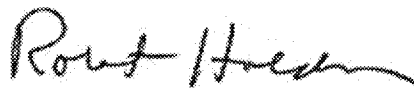
DPE's contact information for DPE is as follows:

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Counsel for Denka Performance Elastomer LLC

We would appreciate a response from your office as quickly as possible due to the upcoming recommended filing date. Thank you for your attention to this.

Yours very truly,



Robert E. Holden  
Attorney for Denka Performance Elastomer LLC

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cc: Dr. Jennifer Orme-Zavaleta, Deputy Administrator for Science, ORD  
Ms. Tina Bahadori, ScD ORD/NCEA Director  
Dr. Stephen Fine, Ph.D., Acting Chief Information Officer  
Mr. David Gray, EPA Region 6 Director of External Affairs  
Ms. Vincia Holloman, Director of Enterprise Quality Management Division  
Ms. Anne Idsal, JD, Region 6 Administrator  
Mr. John Vandenberg, ORD/NCEA RTP Division Director  
Ms. Kistina Thayer, ORD/NCEA IRIS Division Director